

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK TIMES COMPANY,	:	
	:	No. 1:23-cv-11195-SHS
Plaintiff,	:	
	:	
v.	:	
	:	
MICROSOFT CORPORATION, OPENAI,	:	
INC., OPENAI LP, OPENAI GP, LLC,	:	
OPENAI, LLC, OPENAI OPCO LLC,	:	
OPENAI GLOBAL LLC, OAI	:	
CORPORATION, LLC, and OPENAI	:	
HOLDINGS, LLC,	X	
Defendants.		

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Andrew L. Perito hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OPCO LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.

I am in good standing at the bar of the state of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: San Francisco, California
August 19, 2024

MORRISON & FOERSTER LLP

By: /s/ Andrew L. Perito

Andrew L. Perito (*pro hac vice* pending)

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OAI CORPORATION, LLC, and

OPENAI HOLDINGS, LLC